

EXHIBIT A

CARLSON LYNCH, LLP
Todd D. Carpenter (SBN 234464)
tcarpenter@carlsonlynch.com
Scott G. Braden (SBN 305051)
sbraden@carlsonlynch.com
1350 Columbia Street, Suite 603
San Diego, CA 92101
Tel: 619-762-1910
Fax: 619-756-6991

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE PLUM BABY FOOD LITIGATION

Master File No. 4:21-cv-00913-YGR

This Document Relates to: 21-cv-2059, David.
JESSICA DAVID, HEATHER AGE, and MAY
MOORE, individually, and on behalf of all other
similarly situated

DECLARATION IN SUPPORT OF JURISDICTION

Plaintiffs,

V.

PLUM, PBC.; and DOES 1 through 10, inclusive,

Defendants.

I, Todd D. Carpenter, declare under penalty of perjury the following:

1. I am an attorney duly licensed to practice before all of the courts in the State of California.

I am a partner and part-owner of Carlson Lynch LLP and counsel of record for Plaintiffs in the above-entitled action.

2. Defendant Plum, PBC (“Plum”) has done, and is doing, business in the County of San Diego. Such business includes the marketing, distributing, and retail and online sales of baby food products.

3. Plaintiff Mayra Moore (“Plaintiff”) purchased a variety of Plum’s baby food products, including, but not limited to, the following:

- 1 a. Plum Organics Stage 1 (4+ months) Just Sweet Potato Organic Baby Food
2 Pouch
- b. Plum Organics Stage 2 (6+ months) Mango, Sweet Potato, Apple & Millet
3 Organic Baby Food Pouch
- c. Plum Organics Stage 2 (6+ months) Mango, Yellow Zucchini, Corn &
4 Turmeric Organic Baby Food Pouch
- d. Plum Organics Stage 2 (6+ months) Pea, Kiwi, Pear & Avocado Organic
5 Baby Food Pouch
- e. Plum Organics Stage 2 (6+ months) Peach, Banana & Apricot Organic Baby
6 Food Pouch
- f. Plum Organics Stage 2 (6+ months) Pear & Mango Organic Baby Food
7 Pouch
- g. Plum Organics Stage 2 (6+ months) Pear, Purple Carrot & Blueberry
8 Organic Baby Food Pouch
- h. Plum Organics Stage 2 (6+ months) Pear, Spinach & Pea Organic Baby
9 Food Pouch
- i. Plum Organics Stage 2 (6+ months) Sweet Potato, Apple & Corn Organic
10 Baby Food Pouch
- j. Plum Organics Banana with Pumpkin Little Teethers Wafers
- k. Plum Organics Blueberry Little Teethers Wafers
- l. Plum Organics Tots Jammy Sammy–Peanut Butter & Strawberry Bar

12 4. Plaintiff purchased these products from Sprouts and Target Stores in San Diego County.

13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct.

15 Executed May 18, 2021, in San Diego, California.

16 /s/ Todd D. Carpenter
17 Todd D. Carpenter